

EMILY A. ELLIS, ESQ., Nevada Bar No. 11956
eellis@bhfs.com
BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, NV 89106-4614
Telephone: 702.382.2101
Facsimile: 702.382.8135

*Attorneys for Defendants NELNET LOAN SERVICES
and GREAT LAKES EDUCATIONAL LOAN
SERVICES*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

AMANDA GATES,

Plaintiff,

v.

EQUIFAX INFORMATION SERVICES,
LLC; NAVIENT; NELNET LOAN
SERVICES; GREAT LAKES
EDUCATIONAL LOAN SERVICES;
TRANS UNION LLC; AND U.S.
BANKCORP,

Defendants.

CASE NO.: 2:19-cv-01710-APG-VCF

**JOINT MOTION AND ORDER
EXTENDING DEFENDANTS NELNET
LOAN SERVICES AND GREAT LAKES
EDUCATIONAL LOAN SERVICE'S
TIME TO FILE AN ANSWER OR
OTHERWISE RESPOND TO
PLAINTIFF'S COMPLAINT**

(FIRST REQUEST)

Plaintiff AMANDA GATES ("Plaintiff") and Defendants NELNET LOAN SERVICES and GREAT LAKES EDUCATIONAL SERVICES ("Nelnet Defendants"), by and through their respective counsel, file this Joint Motion Extending Nelnet Defendants' Time to File an Answer or Otherwise Respond to Plaintiff's Complaint.

On October 1, 2019, Plaintiff filed her Complaint. The current deadlines for the Nelnet Defendants to answer or otherwise respond to Plaintiff's Complaint are October 25, 2019 and November 7, 2019. The claims at issue necessitate additional time for fact-finding. Further, the Nelnet Defendants are in the process of acquiring and reviewing all relevant documents so they can meaningfully respond to the specific allegations contained in Plaintiff's Complaint. Moreover, undersigned counsel was just retained by the Nelnet Defendants in this action, and therefore requires additional time to investigate the allegations and claims asserted against the

Nelnet Defendants. Plaintiff has no opposition to Nelnet Defendants' request for an extension until November 15, 2019, to file an answer or otherwise respond to Plaintiff's Complaint.

The parties submit that this is the first joint motion for extension of time for Nelnet Defendants to respond to Plaintiff's Complaint, the request is not brought for purpose of delay, and good cause exists for granting the same.¹

DATED this 4th day of November, 2019.

BROWNSTEIN HYATT FARBER
SCHRECK, LLP

By: /s/ Emily A. Ellis

Emily A. Ellis, Esq.
Nevada Bar No. 11956
100 North City Parkway, Suite 1600
Las Vegas, NV 89106-4614

Attorneys for Defendants NELNET LOAN
SERVICES and GREAT LAKES
EDUCATIONAL LOAN SERVICES

HAINES & KRIEGER, LLC

By: /s/ David H. Krieger

David H. Krieger, Esq.
Nevada Bar No. 9086
8985 S. Eastern Ave., Suite 350
Henderson, NV 89123
Email: dkrieger@hainesandkrieger.com

and

KNEPPER & CLARK LLC

By: /s/ Matthew I. Knepper

Matthew I. Knepper, Esq.
Nevada Bar No. 12796
Miles N. Clark, Esq.
Nevada Bar No. 13848
5510 S. Fort Apache Road, Suite 30
Las Vegas, NV 89148-7700
Emails:
matthew.knepper@knepperclark.com
miles.clark@knepperclark.com

Attorneys for Plaintiff AMANDA GATES

¹ A Proposed Order granting the motion is attached hereto as Exhibit A.

CERTIFICATE OF SERVICE

Pursuant to Fed.R.Civ.P.5(b), and Section IV of District of Nevada Electronic Filing Procedures, I certify that I am an employee of BROWNSTEIN HYATT FARBER SCHRECK, LLP, and that the foregoing **JOINT MOTION AND [PROPOSED] ORDER EXTENDING DEFENDANTS NELNET LOAN SERVICES and GREAT LAKES EDUCATIONAL LOAN SERVICE'S TIME TO FILE AN ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT (FIRST REQUEST)** was served via electronic service on the 4th day of November, 2019, and to the addresses shown below:

Jennifer R. Bergh, Esq. QUILLING SELANDER LOWNDS WINSLETT & MOSER, P.C. 6900 N. Dallas Parkway, Suite 800 Plano, TX 75024 Email: jbergh@qslwm.com <i>Counsel for Defendant Trans Union LLC</i>	Trevor Waite, Esq. ALVERSON TAYLOR & SANDERS 6605 Grand Montecito Parkway, Suite 200 Las Vegas, NV 89149 Email: twait@alversontaylor.com <i>Designated Attorney for Personal Service for Counsel for Trans Union LLC</i>
David H. Krieger, Esq. HAINES & KRIEGER, LLC 8985 S. Eastern Ave., Suite 350 Henderson, NV 89123 Email: dkrieger@hainesandkrieger.com <i>Attorneys for Plaintiff Amanda Gates</i>	Matthew I. Knepper, Esq. Miles N. Clark, Esq. KNEPPER & CLARK LLC 5510 S. Fort Apache Road, Suite 30 Las Vegas, NV 89148 Emails: matthew.knepper@knepperclark.com miles.clark@knepperclark.com <i>Attorneys for Plaintiff Amanda Gates</i>
Michael R. Ayers, Esq. HOLLEY, DRIGGS, WALCH, FINE, PUZEY, STEIN & THOMPSON 800 S. Meadow Parkway, Suite 800 Reno, NV 89521 Email: mayers@nevadafirm.com <i>Attorneys for Defendant Navient Solutions, LLC</i>	Jeremy J. Johnson, Esq. CLARK HILL PLLC 3800 Howard Hughes Parkway, Suite 500 Las Vegas, NV 89169 Email: jthompson@clarkhill.com <i>Attorneys for Defendant Equifax Information Services, LLC</i>

...

...

Dominica C. Anderson, Esq.
Tyson E. Hafen, Esq.
DUANE MORRIS, LLP
100 North City Parkway, Suite 1560
Las Vegas, NV 89106
Email: dcanderson@duanemorris.com
tehafen@duanemorris.com
Attorneys for Defendant U.S. BankCorp

/s/ Paula Kay
an employee of Brownstein Hyatt Farber Schreck, LLP

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

INDEX OF EXHIBITS

EXHIBIT A: [Proposed] Order

EXHIBIT A

[PROPOSED] ORDER

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

AMANDA GATES,

Plaintiff,

v.

EQUIFAX INFORMATION SERVICES,
LLC; NAVIENT; NELNET LOAN
SERVICES; GREAT LAKES
EDUCATIONAL LOAN SERVICES;
TRANS UNION LLC; AND U.S.
BANKCORP,

Defendants.

CASE NO.: 2:19-cv-01710-APG-VCF

**ORDER RE JOINT MOTION
EXTENDING DEFENDANTS NELNET
LOAN SERVICES AND GREAT LAKES
EDUCATIONAL LOAN SERVICE'S
TIME TO FILE AN ANSWER OR
OTHERWISE RESPOND TO
PLAINTIFF'S COMPLAINT**

1 The Court having considered the Joint Motion Extending Defendants Nelnet Loan
2 Services and Great Lakes Educational Loan Service's Time to File an Answer or Otherwise
3 Respond to Plaintiff's Complaint (First Request) ("Joint Motion for Extension of Time"), finds as
4 follows:

5 IT IS HEREBY ORDERED that the Joint Motion for Extension of Time is GRANTED.

6 IT IS FURTHER ORDERED that Defendants Nelnet Loan Services and Great Lakes
7 Educational Loan Service shall have up to and including November 15, 2019, to respond to
8 Plaintiff's Complaint.

9 DATED this 6th day of November, 2019

10 

11 CAM FERENBACH
12 UNITED STATES MAGISTRATE JUDGE
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28